

## CHRISTOPHER MADIOU

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October 7, 2020

Hon. Laura Taylor Swain  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007  
*By ECF*

### MEMO ENDORSED

Re: *United States v. Jian Feng Wu*, 18 Cr. 905 (LTS)

Dear Judge Swain,

I represent Jian Feng Wu in the above-captioned case. I write with consent from the government to request an adjournment Mr. Wu's sentencing, which is currently scheduled for November 5, 2020, to a date after January 20, 2021.

Mr. Wu has been released on bail conditions since his arrest without issue. Since the outset of the Covid-19 pandemic, I have had limited access to Mr. Wu, who requires a Fuzhou interpreter in order to confer with me. This insufficient access to Mr. Wu during the most critical phase of his case prevents me from being adequately prepared for his upcoming sentencing including preparing him and advising him regarding potential immigration consequences. In addition, Mr. Wu is the only caregiver to his elderly father who requires daily assistance during the ongoing pandemic. The requested adjournment will allow me to adequately prepare with Mr. Wu and allow him to care for himself and his family during this ongoing crisis.

Therefore, I respectfully request that the Court adjourn Mr. Wu's sentencing to a date after January 20, 2021 to adequately assure counsel's effective assistance at sentencing.

Thank you in advance for your consideration.

Sincerely,



Christopher Madiou

The sentencing is adjourned to  
February 4, 2021, at 11:30 a.m. and the  
related deadlines are modified  
accordingly.  
DE# 153 resolved.  
SO ORDERED.  
10/7/2020  
/s/ Laura Taylor Swain, USDJ

Cc: AUSAs Alexandra Rothman and Elizabeth Espinosa (via ECF)